

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HENRY H. BRECHER, Individually And On .  
Behalf Of All Others Similarly Situated, .

Plaintiff, .

v. .

REPUBLIC OF ARGENTINA, .

Defendant. .  
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No. 06 CV 15297 (TPG)

ECF CASE

**PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

1. Pursuant to Fed. R. Civ. P. 23(a) and (b)(3), Plaintiff moves for an order (i) certifying a Class of all persons who own beneficial interests in a bond issued by the Republic of Argentina and who have suffered damages as a result of Argentina's default in December 2001; (ii) appointing Class member Henry H. Brecher as the Class Representative; (iii) approving Mr. Brecher's selection of Class counsel, Hagens Berman Sobol Shapiro LLP as lead counsel, and Meredith Cohen Greenfogel & Skirnicks, P.C. as local counsel; and (iv) for such other relief as this Court deems just and proper.

2. The bond is identified as ISIN XS0113833510, denominated in Euros, with a coupon rate of 9.25% and a maturity date of July 20, 2004 (the "Bond").

3. The proposed class is limited to persons who continuously own beneficial interests in the Bond from the date of class certification until the date of final judgment in the district court.

4. Excluded from this action are Defendant; any subsidiaries, agencies, departments, or affiliates of Defendant; the officers, directors, civil servants, and employees of Defendant during the Class period; members of the aforementioned persons' immediate families; any person, firm, trust, department, bank, agency, corporation, entity, officer, director, or individual in which Defendant has a controlling interest or which is related to, or affiliated with, Defendant; and the legal representatives, agents, affiliates, heirs, successors-in-interest or assigns of any such excluded party.

5. This motion is fully supported by the accompanying brief and exhibits.

DATED: July 31, 2008

Respectfully submitted,

MEREDITH COHEN GREENFOGEL &  
SKIRNICK, P.C.

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